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9 UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF WASHINGTON

11 UNITED STATES OF AMERICA,

Case No.: 4:20-cr-06004-SAB

12 Plaintiff,

Motion for Detention

13 v.

14 JORGE BALLESTEROS,

15 Defendant.

16
17 The United States moves for pretrial detention of Defendant, pursuant to 18
18 U.S.C. § 3142(e) and (f).

19
20 1. Eligibility of Case

21 This case is eligible for a detention order because the case involves (check
22 one or more):

23
24 ☐ Crime of violence (as defined in 18 U.S.C. § 3156(a)(4) which
25 includes any felony under Chapter 77, 109A, 110 and 117);

26
27 ☐ Maximum penalty of life imprisonment or death;

1 ☐ Drug offense with maximum penalty of 10 years or more;

2 ☐ Felony, with two prior convictions in above categories;

3 ☐ Felony that involves a minor victim or that involves the possession or

4 use of a firearm or destructive device as those terms are defined in 18 U.S.C.

5 § 921, or any other dangerous weapon, or involves a failure to register under 18

6 U.S.C. § 2250;

7 ☒ Serious risk Defendant will flee; or

8 ☒ Serious risk obstruction of justice.

9 2. Reason for Detention

10 The Court should detain Defendant because there is no condition or

11 combination of conditions which will reasonably assure (check one or both):

12 ☒ Defendant's appearance as required; or

13 ☒ Safety of any other person and the community.

14 3. Rebuttable Presumption.

15 The United States ☐ will ☒ will not invoke the rebuttable

16 presumption against Defendant under 18 U.S.C. § 3142(e).

17 If the United States is invoking the presumption, it applies because there is

18 probable cause to believe Defendant committed:

19 ☐ Drug offense with maximum penalty of 10 years or more;

1 ☐ An offense under 18 U.S.C. §§ 924(c), 956(a), or 2332b;

2
3 ☐ An offense under 18 U.S.C. §§ 2332b (g)(5)(B) for which a maximum
4 term of imprisonment of 10 years or more is prescribed;

5
6 ☐ An offense under chapter 77 of Title 18, United States Code, for
7 which a maximum term of imprisonment of 20 years or more is prescribed;

8
9 ☐ An offense involving a minor victim under 18 U.S.C. §§ 1201, 1591,
10 2241, 2242, 2244(a)(1), 2245, 2251, 2251A, 2252(a)(1), 2252(a)(2), 2252(a)(3),
11 2252A(a)(1), 2252A(a)(2), 2252A(a)(3), 2252A(a)(4), 2260, 2421, 2422, 2423, or
12 2425;

13
14 ☐ Other circumstances as defined in 18 U.S.C. § 3142(e)(2).
15

16 4. Time for Detention Hearing

17 The United States requests that the Court conduct the detention hearing:

18
19 ☒ At the first appearance, or

20
21 ☐ After a continuance of three days.

22 5. No Contact Order

23 The United States further requests, in addition to pretrial confinement, that
24 Defendant be subject to the following condition:

25 Defendant shall have no contact whatsoever, direct or indirect, with any
26
27 persons Defendant knows or reasonably should know are or may become a victim
28

1 or potential witness in the subject investigation or prosecution. Prohibited forms of
2 contact include, but are not limited to, telephone, mail, email, text, video, social
3 media, and/or any contact through any third person or parties.
4

5 Dated: May 5, 2022.

6 Vanessa R. Waldref
7 United States Attorney

8 s/Matthew A. Stone
9 Matthew A. Stone
10 Assistant United States Attorney
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CERTIFICATE OF SERVICE

I hereby certify that on May 5, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to Defendant's counsel of record, if any have been appointed or retained.

s/Matthew A. Stone

Matthew A. Stone
Assistant United States Attorney